

October 3, 2006

Dave Walls
Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

RE: California State Fire Marshal's Proposed Code Changes

Dear Mr. Walls:

Thank you for allowing Rayonier to comment on the State Fire Marshal's proposed changes to the International Building Code currently being considered for adoption in California. Although we have no operations in California, as a manufacturer of wood products we are concerned about the negative impact of the proposed changes on our industry.

Rayonier supports the collective International codes, which have been developed in an open and fair process, and we urge California, to adopt the model International codes with the fewest possible amendments.

The package of code changes prepared by the State Fire Marshal's office contains approximately 995 proposals. The majority of these code changes were taken from previous editions of the California Building Code and were requirements in the older, and now outdated, 1997 Uniform Building Code. The proposals ignore advances made in building technology and understanding over the last 10 years and do not recognize newer provisions published in the International Building Code. If approved, this will make California's building code "unique" among other States and cities adopting the International Building Code, thus defeating the purpose of a single national building code.

California would benefit from the adoption of the International Building Code, with limited amendment, as the uniformity of requirements would help California firms sell more efficiently across state lines.

The local amendments proposed will result in the California building code being significantly different from the International Building Code adopted in every other state and even that which has been proposed by the City of New York. Designers will be forced to spend valuable time and effort learning a unique California building code instead of using the code familiar to elsewhere in the U.S.

Every other state with a mandatory statewide building code has recognized the new ICC codes as representing the state-of-the-art and appropriately adopted them without substantive amendment. As these codes are developed in an international consensus forum and are voted upon only by state and local code officials, they represent the best professional thinking on these issues.

The process that produced the ICC *International Building Code* was fair and open to all interests and included extensive input from California and from the many other states which previously relied upon the UBC. To ensure a single national building code and the health of the building and wood products industry, we urge adoption of the IBC with limited amendment.

Thank you for considering our comments.

Respectfully submitted,